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August 31, 2022

VIA ECF

The Honorable Jesse Furman United States District Court Southern District of New York Thurgood Marshall U.S. Courthouse 40 Foley Square New York, NY 10007 Application GRANTED. The Clerk of Court is directed to terminate ECF No. 644. SQ ORDERED.

September 6, 2022

Re: In re: AXA Equitable Life Insurance Co., Case No. 16-cv-740 (S.D.N.Y.)

Dear Judge Furman:

Plaintiff in the above-captioned action offers this letter-motion to seal pursuant to Rule 7.B. of Your Honor's Individual Rules and Practices in Civil Cases regarding Exhibit 1 to the Declaration of Mark Musico in Support of Class Plaintiff's Memorandum of Law on the Implications of the Court's Ruling on Wells Fargo's Standing.

Exhibit 1 is a list of members of the Illustration-Based Claims Class. Exhibit 1 contains the confidential information of third parties, namely the identities of absent class members and the policies—identified by policy number—owned by them. This information was also "Confidential" by AXA pursuant to the terms of the protective order. In light of the privacy and confidentiality interests of third party absent class members, Class Plaintiffs respectfully request that Exhibit 1 remain under seal. See, e.g., Awestruck Mktg. Grp., LLC v. Black Ops Prods., LLC, No. 16-CV-3639 (RJS), 2016 WL 8814349, at *3 (S.D.N.Y. June 20, 2016)

Sincerely,

/s/ Rohit D. Nath

Rohit D. Nath